

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ARBUTUS BIOPHARMA CORPORATION)	
and GENEVANT SCIENCES GmbH,)	
)	
Plaintiffs,)	
)	C.A. No. 22-252 (MSG)
v.)	
)	
MODERNA, INC. and MODERNATX, INC.)	
)	
Defendants.)	

**JOINT MOTION AND [PROPOSED] ORDER TO
SEAL PORTIONS OF MODERNA’S OPPOSITION TO
PLAINTIFFS’ MOTION TO COMPEL SAMPLES (D.I. 183)**

Pursuant to the Protective Order (D.I. 91) as modified by the Court’s November 14, 2023 Order (D.I. 155), the parties jointly move this Court for an order granting leave to file partially redacted versions of Moderna’s Opposition to Plaintiffs’ Motion to Compel Samples (D.I. 183) (“Moderna’s Opposition”) and Exhibits 4-5, 7-8, 14-15, 19-23, 25-26 thereto, and permit Exhibits 6, 10, 11, and 24 to remain under seal (collectively, the “Confidential Materials”).

Moderna’s motion and supporting papers redact for the parties’ confidential information. The Confidential Materials either include, or reference and/or quote, the parties’ sensitive and confidential information. The grounds for the motion are set forth in the parties’ joint brief in support of this motion, as well as the declarations of Peter Wojciechowski and Ed Yaworski attached thereto. Redacted versions of the exhibits will be filed separately on the docket.

WHEREFORE, the parties respectfully request that the Court grant the parties’ joint motion and enter the enclosed order permitting the parties to file redacted versions of the above documents.

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January 10, 2024

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ARBUTUS BIOPHARMA CORPORATION)	
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)	
MODERNA, INC. and MODERNATX, INC.)	
)	
Defendants.)	

[PROPOSED] ORDER

The Court, having considered the parties' Joint Motion to Seal (the "Motion"), IT IS
HEREBY ORDERED this ____ day of _____, 2023 that the Motion is GRANTED.

Leave is given for Moderna to file Moderna's Opposition (D.I. 183) and Exhibits 4-5, 7-8,
14-15, 19-23, 25-26 thereto in redacted form and leave Exhibits 6, 10, 11, and 24 under seal

United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that on January 10, 2024, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on January 10, 2024, upon the following in the manner indicated:

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